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November 30, 2022

**Via ECF**

Hon. Cathy L. Waldor, U.S.M.J.  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

Re: Sun Chemical Corporation v. American Home Assurance Company, et al.  
Civil Action No. 2:20-cv-06252 (SRC-CLW)

Dear Judge Waldor:

Counsel for Plaintiff, Sun Chemical Corporation, and Counsel for newly added Defendant, Great American Alliance Insurance Company ("Great American Alliance"), are in the process of negotiating a stipulation, the purpose of which will be to preserve claims and defenses for both parties and to effectuate a dismissal of Great American Alliance without prejudice.

Great American Alliance's motion to dismiss is currently returnable on December 19<sup>th</sup>, with Sun Chemical's opposition brief due on December 5<sup>th</sup>. The parties jointly request that the motion to dismiss be adjourned until January 17<sup>th</sup> to permit time for the parties to negotiate a mutually acceptable stipulation.

Respectfully submitted,  
NORRIS McLAUGHLIN, P.A.

A handwritten signature in blue ink, appearing to read 'Martha N. Donovan'.

Martha N. Donovan

RUGGERI PARKS WEINBERG LLP

A handwritten signature in blue ink, appearing to read 'James P. Ruggeri'.

James P. Ruggeri

cc: All Counsel of Record (Via ECF)

**SO-ORDERED:**

**December 1, 2022**

/s/ Cathy L. Waldor  
Cathy L. Waldor, U.S.M.J.